

TRI-PARTY AGREEMENT

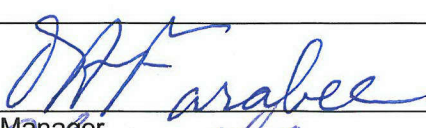


Change Notice Number TPA-CN- 613	TPA CHANGE NOTICE FORM	Date: February 26, 2014
Document Number, Title, and Revision: DOE/RL-2010-33, <i>Removal Action Work Plan for Central Plateau General Decommissioning Activities</i> , Revision 0		Date Document Last Issued: April 2010
Originator: Wayne Toebe		Phone: 372-2359
Description of Change: This change modifies DOE/RL-2010-33, Rev. 0 to add the Hanford steam lines to the Central Plateau General Decommissioning RAWP.		
<p>_____ O.A. Farabee _____ and _____ C.J. Guzzetti/F.W. Bond _____ agree that the proposed change DOE EPA/Ecology modifies an approved workplan/document and will be processed in accordance with the Tri-Party Agreement Action Plan, Section 9.0, <i>Documentation and Records</i>, and not Chapter 12.0, <i>Changes to the Agreement</i>. Revised pages are attached. Added text is shown with <u>double underline</u> and deleted text is shown by strikethrough. Affected page numbers are 1-10, 2-4, and 4-6. The 4 shaded entries of Table 1-1 on page 1-10 were added to Rev. 0 of the subject document through previous change notices, and are included here for completion.</p>		
Justification and Impacts of Change: Hanford steam lines are incorporated into the scope of the non-time critical removal action (NTCRA) by adding them to DOE/RL-2010-33, Table 1-1, 'Building/Structure List and Locations,' in accordance with the provisions of DOE/RL-2010-22, <i>Action Memorandum for General Hanford Site Decommissioning Activities</i> . Language has also been added to clarify the approach for temporary onsite management, including the option for management at a centralized storage location. The Hanford steam lines meet the criteria for addition to the NTCRA based on the following: <ul style="list-style-type: none">• The steam lines are suitable for routine decommissioning methods, and• The steam lines are not addressed by another approved CERCLA decision document or RCRA closure plan for which implementation would eliminate the release or threat of release of hazardous substances to the environment.		
Approvals:		
 _____ DOE Project Manager	<u>2/26/14</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
 _____ EPA Project Manager	<u>2/28/14</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved
 _____ Ecology Project Manager	<u>3/3/14</u> Date	<input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved

Table 1-1. Building / Structure List and Locations

Building/Structure Designation	Area	ERDF Approximate Waste Quantity (ton)
MO556	200W	100
MO563	200W	50
MO573	200W	20
MO710	200W	10
MO720	200W	1,180
MO721	200W	300
MO739	200W	40
MO743	200W	440
MO760	200W	120
MO837	200W	50
MO841	200W	100
MO847	200W	20
MO892	200W	110

Table 1-1. Building / Structure List and Locations

Building/Structure Designation	Area	ERDF Approximate Waste Quantity (ton)
MO906	200W	110
MO939	200W	50
MO956	200W	120
MO970	200W	270
MO971	200W	270
X8	200W	10
HO-64-5928	200W	5
2701-ZE	200W	20
2701-ZC	200W	5
VB-OSS and VB-E	200W	5
<u>Hanford Steam Lines</u>	<u>200E and 200W</u>	<u>1,200</u>

1.3.2 Release or Threatened Release into the Environment of a Hazardous Substance, Pollutant, or Contaminant

Contaminant sources addressed by this RAWP include both radioactive and chemical hazardous substances.

The primary sources of hazardous substances potentially include, but are not limited to the following:

- Americium-241
- Cesium isotopes
- Cobalt-60
- Europium isotopes
- Strontium-90
- Plutonium isotopes
- Uranium isotopes
- Tritium (in exit signs)
- Asbestos-containing material (ACM)
- Cadmium
- Beryllium
- Lead paint and shielding
- Polychlorinated biphenyls (PCBs) (e.g., light ballasts and surface coatings)
- Mercury (typically found in electrical switches, gauges, thermometers and lighting)
- Refrigerants (e.g., Freon)
- Lubricants

- Decontamination activities will be performed within the area of contamination.
- The amount of water used to clean equipment will be minimized, using raw or potable water.
- Soaps, detergents, or other cleaning agents may be added to wash water as long as there are no regulated levels of constituents present.

In some instances, more aggressive equipment decontamination methods (e.g., grinding or wet grit blasting) may be used for equipment decontamination if other methods fail, and will also be conducted by trained site workers using best management practices to minimize the potential for airborne contamination and waste generation.

The project may also opt to perform other methods of equipment washing and/or decontamination for a completed site (e.g., wrap the equipment for transfer to a decontamination pad, provide for a temporary facility at the site to collect wash water, or fix the contamination to the equipment). Decontamination fluid/wash water that is collected will be managed in accordance with Section 4.2 of this RAWP.

2.2.2.3 Demolition Activities

Demolition of building and structures will include removal of above-grade structures. The majority of the demolition will require the use of heavy equipment (e.g., excavator with various attachments) to demolish the structures. Other standard industry or conventional demolition practices also may be used (e.g., hydraulic shears with steel shear jaws, concrete pulverizer jaws or breaker jaws, cranes with wrecking ball, pneumatic hammers, mechanical saws, cutting torches, and/or controlled explosives). Demolition methods will be selected based on the structural elements to be demolished, remaining contamination, location, and integrity of the structure. Controls such as portable ventilation filter units, HEPA-filtered vacuum cleaners, greenhouses, fogging agents, and/or water may be used to control dust generated from demolition activities. The amount of water used will be minimized to prevent ponding and runoff. Additional stormwater run-on and run-off controls may be implemented, as needed. Such controls, if applicable, will be described in the work packages.

Equipment and piping within and around the buildings/structures, including pumps, pipes, tanks, boilers, compressors, ductwork, electrical components, and other equipment may be removed, as necessary. Below-grade structures will be removed and disposed of in the same fashion as above-grade buildings and structures. However, if below-grade structures (including basements, pipes and utility systems) are not contaminated or may be decontaminated, they will optionally be left in place, void spaces backfilled, and brought to grade. Backfill will consist of clean fill materials and/or inert demolition waste from the above-grade structures. Piping and drains entering or exiting each building/structure below-grade will be plugged or grouted to prevent potential pathways to the environment. Depending on the configuration of the area to be excavated, shoring or sloping may be required to comply with safety requirements and to reduce the quantity of excavated soil. Excavations will be backfilled and/or contoured after removal action is completed.

Demolition and disposal of the Hanford steam lines and associated above-grade components and support structures will be addressed by this removal action. The Hanford steam lines are located throughout the central plateau and contain or may contain asbestos insulation which will be removed and packaged for disposal at the ERDF in accordance with National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M standards.

storage area or area of contamination or at a centralized location on the central plateau if prior concurrence is obtained by EPA and Ecology. Containers awaiting analytical results will be marked and labeled as appropriate. ~~Weekly inspections of the containers will be performed to document the integrity, container marking/labeling, physical container placement, storage area boundaries/identification/warning signs, and sign of any potential leakage.~~ Containers showing signs of deterioration will be identified on the container inspection form and will be over packed or repackaged, as necessary.

Spills or releases will be reported as stated in Section 4.5. In the event of a spill or release, action will be taken to protect human health and the environment.

4.2.5 Final Disposal

Wastes generated through implementation of this removal action will be dispositioned at appropriate waste disposal facilities in accordance with the waste acceptance criteria of those facilities. The ERDF is the preferred disposal location for wastes meeting the ERDF waste acceptance criteria.

Waste that does not meet the ERDF waste acceptance criteria may be sent to an offsite facility (e.g., ETF) subject to the facility having received a determination of acceptability by the EPA, in accordance with the Off-Site Rule, 40 CFR 300.400, as applicable.

Aqueous waste determined to be LLW or designated as dangerous or mixed waste may be transported to the ETF for treatment, followed by discharge under Washington's State Waste Discharge Program. ETF is a RCRA-permitted unit authorized to treat aqueous waste streams generated on the Hanford Site and dispose of these streams at a designated state-approved land disposal facility in accordance with applicable requirements. Alternatively, liquids may be solidified for disposal at the ERDF if the waste meets the ERDF waste acceptance criteria.

Waste designated as PCB remediation waste or PCB bulk product waste will be disposed at ERDF, if it meets the waste acceptance criteria. PCB waste that does not meet ERDF waste acceptance criteria may be retained onsite or at a PCB storage area and will be transported for future disposal at an appropriate disposal facility.

4.2.6 Waste Disposal Records

Original Onsite Waste Tracking Forms will be sent to ERDF with each container shipped. Original sample reports and a copy of the Original Onsite Waste Tracking Form for each ERDF container will be retained and forwarded to the assigned waste specialist for inclusion in the project file following final waste disposition.

4.2.7 Waste Treatment

Treatment (e.g., solidification, separation, elementary neutralization, mercury amalgamation, size reduction, repackaging) of certain waste streams may be necessary to provide safe transport, meet waste disposal facility waste acceptance criteria, and/or to address LDR. When necessary, treatment may be conducted at the generating site, ERDF or at an EPA approved offsite facility (e.g., ETF). Offsite treatment must be performed at a facility approved by the EPA in accordance with 40 CFR 300.440. Return of treated waste from offsite treatment facilities for disposal at the ERDF requires authorization from DOE.

4.2.8 Waste Minimization and Recycling

Waste minimization practices will be followed to the extent technically and economically feasible during waste management. Introduction of clean materials into a contamination area as well as contamination of